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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JACQUES LANIER,

Defendant.

CASE NO. 2:19-CR-327 RFB-DJA

**STIPULATION TO CONTINUE
SENTENCING**

(FIRST REQUEST)

It is stipulated and agreed, by and between Jason Frierson, United States Attorney and his Assistant United States Attorney David C. Kiebler, counsel for the United States of America; and Lisa A. Rasmussen, Esq., of The Law Offices of Kristina Wildeveld & Associates, counsel for Jacques Lanier, as follows:

1. That the Sentencing hearing presently scheduled for March 26, 2024 at 11:00 am., is not feasible for the defense as Ms. Rasmussen was recently appointed to represent Mr. Lanier. Additionally, Ms. Rasmussen's appointment was made because Mr. Lanier sent correspondence to the Court indicating that he wished to withdraw his plea.

2. Ms. Rasmussen requests sufficient time to meet and confer with Mr. Lanier as to his options and his best interests and doing this requires an understanding of the history of the

1 case and review of the discovery and pleadings on file in this matter. In other words, the
2 consultation and advice on this issue requires preparation and a thorough review.

3 3. This case was also recently transferred to this Court and sentencing set for March
4 26, 2024.

5 4. The defense is requesting a 90 day extension of time for sentencing and the
6 government is not opposed to this request.

7 5. This request is not made for the purpose of delay, but rather to enable Ms.
8 Rasmussen to thoroughly review the discovery, the prior pleadings in this case, to meet with
9 Mr. Lanier and advise him on his options and then to either (a) prepare for sentencing or (b) file
10 a motion to withdraw his plea.

11 6. This is the first request to continue the sentencing date and neither party is
12 prejudiced by the requested extension, whereas denial of the request would cause prejudice to
13 both parties.

14 Dated: March 14, 2024

15 **The LAW OFFICES OF KRISTINA**
16 **WILDEVELD & ASSOCIATES,**

JASON FRIERSON,
UNITED STATES ATTORNEY

17 /s/ Lisa A. Rasmussen
18 BY: LISA A. RASMUSSEN, ESQ.
19 Counsel For Jacques Lanier

/s/ David C. Kiebler
20 BY: DAVID C. KIEBLER, AUSA
21 Counsel for United States
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ORDER

Upon the Stipulation of the parties and good cause appearing,

IT IS ORDERED that the sentencing hearing presently scheduled for March 26, 2024 at 11:00 a.m. is vacated and rest to _____ at _____

IT IS SO ORDERED.

Dated: _____

The Honorable Richard F. Boulware
United States District Judge